

STATE OF MINNESOTA            )  
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COUNTY OF HENNEPIN        )       ss. AFFIDAVIT OF SCOTT GLEASON, JR.

1. I am a Special Agent (SA) with the United States Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been so employed since October of 2019. As a Special Agent with the ATF, I have completed the Criminal Investigator Training Program at the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia, and Special Agent Basic Training for the ATF, also in Glynco, Georgia. I am empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 922 of Title 18, United States Code. Prior to my employment with the ATF, I was employed by the Clayton, Missouri, Police Department in Clayton, Missouri, for over ten years. During my tenure as an officer with the Clayton Police Department, I was assigned as a Patrol Officer, Task Force Officer assigned to the United States Drug Enforcement Administration, and a Patrol Supervisor. I am currently assigned to the St. Paul Field Division, St. Paul Group I Field Office; and as a result of my training and experience as an ATF Agent, I am familiar with federal firearm and ammunition laws. During and prior to my tenure with the ATF and other law enforcement agencies, I have participated in investigations that involve possession of firearms and ammunition by prohibited persons and

investigations involving interstate firearms and ammunition trafficking.

2. This affidavit is submitted for the limited purpose of establishing probable cause in support of issuing a complaint and arrest warrant for Jason Thomas CIKOTTE for possession of a stolen in violation of Title 18, United States Code, Section 922(j) and 924(a)(2).

3. This affidavit is based on my personal knowledge, as well as information I have learned from other law enforcement officers and the review of reports, written materials, and recordings. This affidavit does not include all of the details I have learned regarding this investigation. Rather, it only includes information believed to be sufficient to establish probable cause.

### **PROBABLE CAUSE**

4. In August of 2021, I received information from the ATF Office of Strategic Intelligence and Information (OSII) that several firearms had been stolen while in transit to Federal Firearms Licensees (FFLs). Over the next several months, I received numerous additional notifications of firearms thefts from shipments to FFLs. The common carrier for these firearms was XPO Logistics, which has a facility in St. Cloud, Minnesota, and another in Fridley, Minnesota.

5. On January 12, 2022, another ATF special agent and I went to the Fridley XPO Logistics Service Center, located at 51 81st Avenue NE, Fridley, Minnesota 55432. Upon arrival, we met with the operations manager and an

assistant senior manager. Both managers said they had been on vacation during the timeframe that the firearms went missing. They agreed to forward my information to XPO Logistics corporate security.

4. On March 9, 2022, an additional 11 firearms were stolen during shipment from the XPO logistics facility in Fridley, Minnesota. The firearms are described as follows:

- One Century Arms model Draco NAK 9 9mm semiautomatic AK pistol bearing serial number RON2164653;
- Five Canik model Rival 9mm semiautomatic pistols, gray in color, bearing serial numbers 22CM01503, 22CM01509, 22CM01508, 22CM01507, and 22CM01505; and
- Five Canik model Rival 9mm semiautomatic pistols, black in color, bearing serial numbers 22CM01656, 22CM01661, 22CM01662, 22CM01663, and 22CM01664.

5. On March 16, 2022, I received a telephone call from the manager of corporate security at XPO Logistics. The security manager told me he had identified a suspect in the theft of the 11 firearms on March 9. The security manager believed the person was also responsible for the several other thefts spanning over almost a year from XPO Logistics.

6. The security manager provided a timeline with video surveillance screen shots of Jason CIKOTTE removing firearms from the pallet at the XPO Logistics facility in Fridley, Minnesota. In addition, the security manager said that CIKOTTE works overnight as a weight inspector and has little to no

supervision while at work. The security manager also said CIKOTTE would have no reason to open the pallets of firearms as part of his usual employment duties.

7. The surveillance video timeline indicates the following:

8. On March 9, 2022 at approximately 9:40 p.m., CIKOTTE can first be seen observing a pallet of firearms. He can then be seen taking a photograph of the packing slip with his company-issued iPad to verify the contents of the shipment, which is standard procedure.

9. At approximately 9:47 p.m., CIKOTTE can be seen moving the pallet toward the main office with a forklift. He then takes the pallet of firearms down to open and tear off the shrink wrap. The security manager confirmed that CIKOTTE would have no reason to open this pallet of firearms as part of his normal duties.

10. CIKOTTE can then be seen removing the black shrink wrap from the pallet and taking the pallet apart. He also retrieves a trashcan to throw the black shrink wrap away.

11. At about 10:09 p.m., CIKOTTE can be seen picking up the pallet that has been partially taken apart. As he moves down the dock with the pallet, a box labeled "Century," which appears to be a box of rifles, falls off the pallet. CIKOTTE can be seen stopping the forklift and putting the box back on the pallet. Importantly, "Century" is the brand of one of the firearms that



was stolen on this evening.

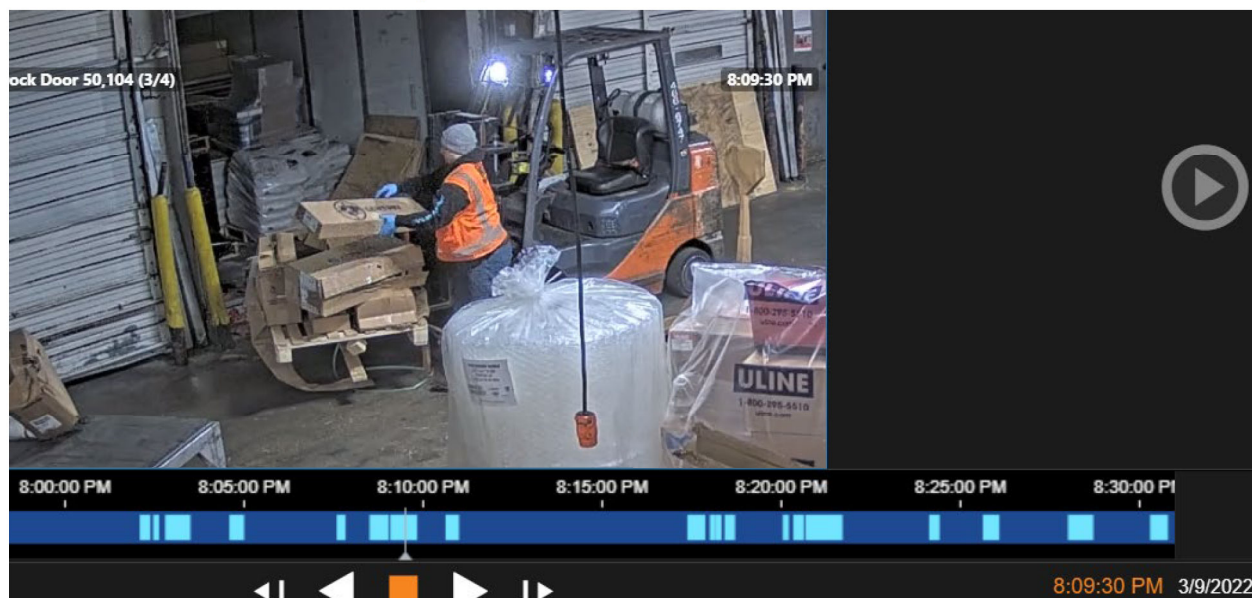


Fig. 1: CIKOTTE replacing fallen “Century” boxes.

12. At about 10:13 p.m., CIKOTTE can be seen stopping the forklift and removing several boxes. He then places these boxes in a trailer by the main office.

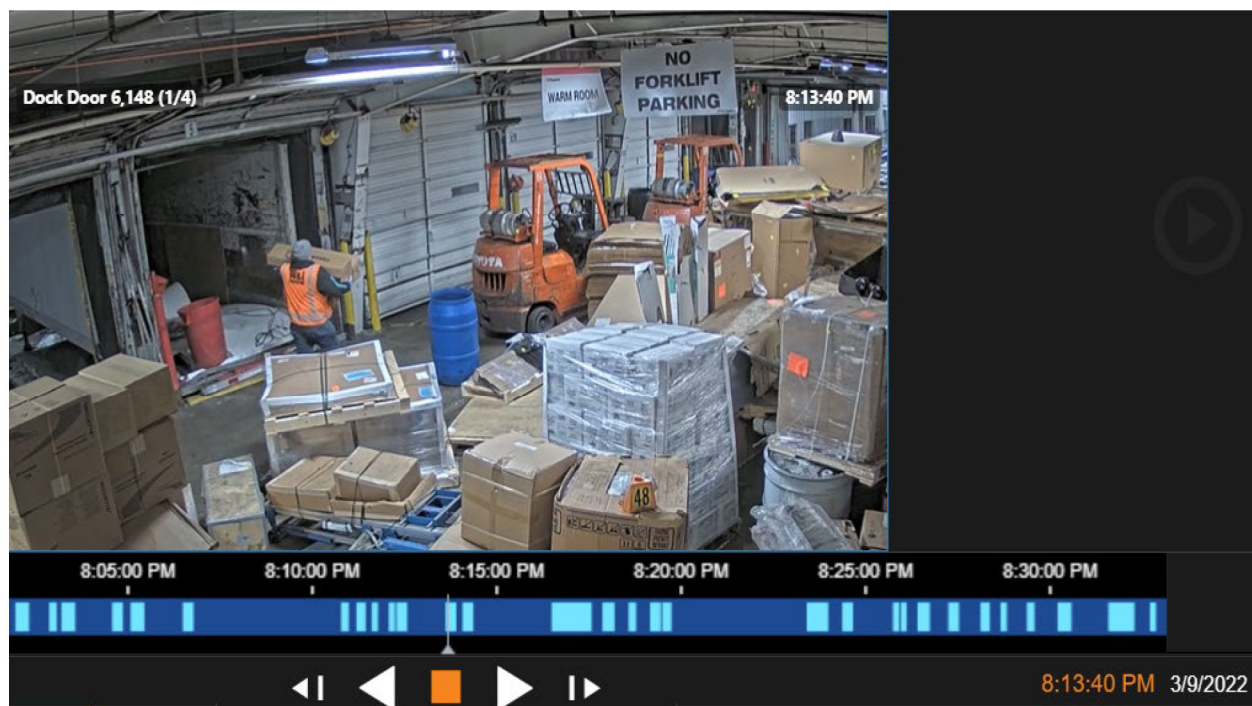


Fig. 2: CIKOTTE removing boxes from the pallet.

13. About a minute later, CIKOTTE can be seen taking the dismantled pallet to another pallet and combining the pallets. He then takes clear shrink wrap, after removing the firearms from the shipment, and shrink wraps both pallets together. After replacing the removed boxes with new boxes, he can be seen taking the pallet back down the dock and leaving it.

14. After leaving the pallet, CIKOTTE can be seen walking into the office area. At about 11:02 p.m., CIKOTTE exits the office, no longer wearing his orange safety vest. He then enters the trailer where he placed the boxes of firearms. Five minutes later, CIKOTTE exits the trailer, and appears to be carrying something. He walks into the parking area where employees park their vehicles.

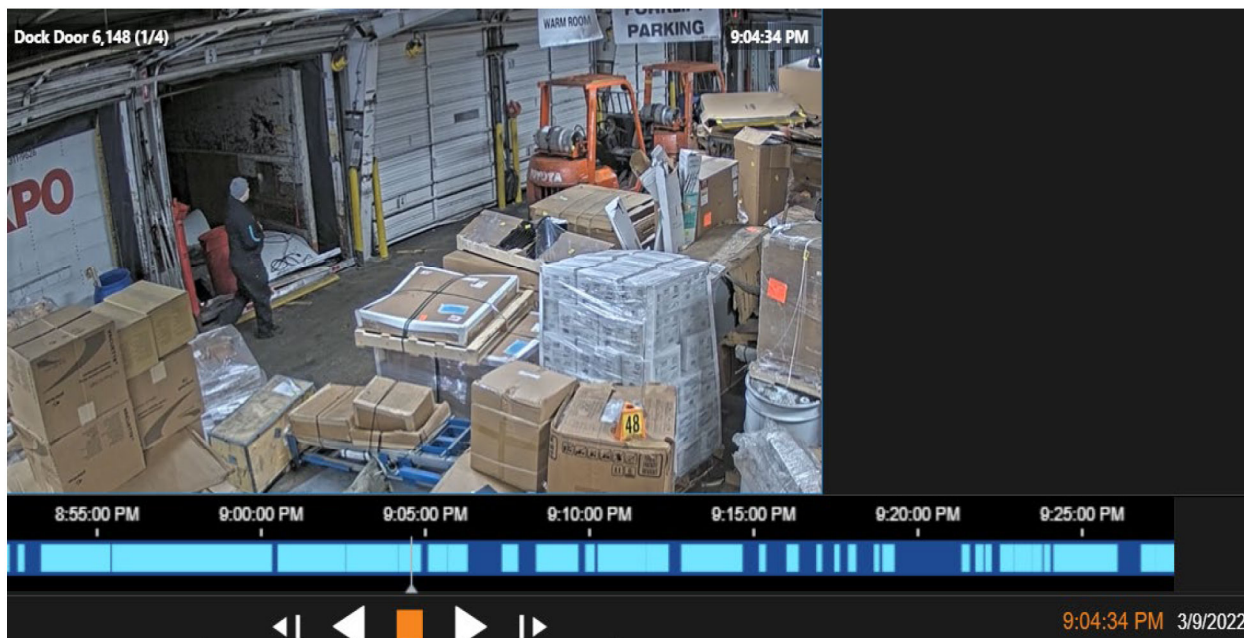


Fig. 3: CIKOTTE walking from the trailer where the boxes had been placed, having removed his orange safety vest.

15. CIKOTTE is not seen on any cameras again until about 12:23 a.m. on March 10, 2022. He can be seen on the dock sipping coffee, still not wearing his orange safety vest. He then re-enters the trailer where he left the boxes of stolen firearms. He can be seen taking the boxes from the trailer and carrying them to the office.

16. About two minutes later, CIKOTTE can be seen leaving the office where he brought the boxes. He has broken down boxes, which he throws into a dumpster. At approximately 12:33 a.m., CIKOTTE can be seen exiting the office door and going into the employee parking area again while carrying what appears to be a large duffle bag. CIKOTTE does not return to work until 12:57, a.m., at which point he no longer has a duffel bag with him.

17. The security manager confirmed that the pallet from which the 11 firearms were reported missing was the same pallet from which CIKOTTE could be seen removing boxes.

18. On March 21, 2022, the security manager alerted me that he had found video from March 10, 2022, of CIKOTTE again removing boxes from palettes. The security manager informed me that CIKOTTE removed the boxes before his shift was set to begin, and had not yet clocked in. Five Ruger 6.5 Creedmoor rifles were reported stolen from that palette.

19. On March 22, 2022, I obtained from this Court a warrant to search CIKOTTE's residence, XXX Birch St. SW, Isanti, Minnesota, 55040 (22-mj-259



(ECW)). On March 23, 2022, other law enforcement personnel and I executed the warrant. Inside the house were approximately 40 firearms, all of which appear to be firearms stolen from XPO Logistics. Among the firearms was the Canik model SFX Rival 9mm semiautomatic pistol bearing serial number 22CM01664, stolen on March 9, 2022 (*see* para. 4, above). Also present in the house were tens of thousands of rounds of ammunition, and miscellaneous firearms parts and accessories.

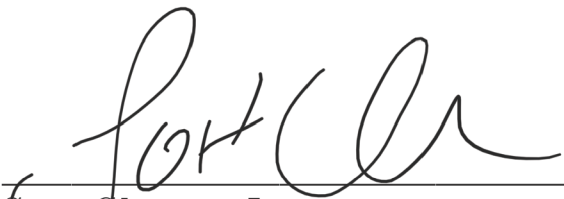
20. CIKOTTE was present during the execution of the search. After advising CIKOTTE of his rights, I spoke to CIKOTTE at his home during the search. CIKOTTE admitted to having stolen the firearms, ammunition, and firearms parts and accessories from XPO Logistics.

21. I am an ATF Interstate Nexus Expert. I have made a preliminary determination that the Canik model SFX Rival 9mm semiautomatic pistol bearing serial number 22CM01664 was not manufactured in the State of Minnesota. As a result, the firearm had to travel in interstate and/or foreign commerce prior to arriving in the State and District of Minnesota on March 23, 2022.

22. Based on the information set forth above, there is probable cause to believe that the Defendant, Jason Thomas CIKOTTE, violated Title 18, United States Code, Section 922(8) and 924(a)(2), by possessing in and affecting interstate commerce a firearm a stolen firearm.



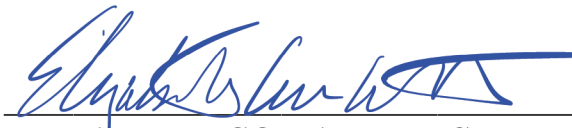
Further your Affiant sayeth not.



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Scott Gleason, Jr.  
Special Agent, ATF

SUBSCRIBED and SWORN before me  
by reliable electronic means via FaceTime, Zoom,  
and email pursuant to Fed. R. Crim. P. 41(d)(3) on  
March 24, 2022:



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ELIZABETH COWAN WRIGHT  
UNITED STATES MAGISTRATE JUDGE  
DISTRICT OF MINNESOTA